

Blumberg & Wolk, LLC

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Attorneys for Defendants, Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, and Kimberley Yvette Smith, M.D., a/k/a Kimberley Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Richard C. DiVerniero, M.D., Richard Strauss, M.D., et al

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION	Docket No. 1:13-md-2419-RWZ MDL No. 02419
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This document relates to:
All New Jersey Cases

NOTICE TO TAKE THE VIDEO DEPOSITION

Please take notice that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, the "Premier Defendants" will take the oral and videotaped deposition of Inspira Medical Center (Formerly South Jersey Healthcare) as an organization, will be taken on the topics detailed below. Inspira shall identify the person(s) who will speak on its

behalf on each topic at least seven(7) days before the deposition(s).

The deposition will take place on Monday, June 22, 2015, and beginning at 10:00 a.m. at the offices of Blumberg & Wolk, LLC located at 158 Delaware Street Woodbury, New Jersey, 08096. The deposition will be recorded by stenographical means and by video. See the Deposition Protocol attached.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), Ameridose's designee(s) shall be prepared to testify regarding the following subjects:

1. The business relationship, and or any relationship by and/or between Inspira and NECC, MSM, Alanus and any other affiliated or related company including the documents reflecting the terms, conditions and scope of such relationship.¹
2. The business relationship, and or any relationship by and/or between Inspira and Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC.
3. Identification of the owners, executives, employees, managers, and other representatives of Inspira, including job titles and description.
4. Inspira's organizational structure and any organizational charts, including the chain of command and decision making authority.

¹ These include any of the following: Ameridose, Medical Sales Management, Medical Sales Management, SW, 203 Flanders Road LLC, 205 Flanders Road, LLC, Alanus Pharmaceuticals, AMD, Cadden Family – 2012 LLC, Cardo Properties, LLC, Conigliaro Block Inc, Conigliaro Family Investments LLC, Conigliaro Industries, Inc, GDC Holdings, Inc, GDC Properties, MSM, Inc, Physicians Choice Medical Marketing, MSM SW, Inc,

5. Inspira's policies and procedures for compounding and/or manufacturing pharmaceuticals, ordering pharmaceuticals, ordering compounded pharmaceuticals from compounding pharmacies including but not limited to NECC, maintaining, organizing, labeling, ordering and storing pharmaceuticals including but not limited to compounded medications.
6. Any and all documentation, correspondence, emails, electronically stored documents, letters, memorandum or other documents relating to or referencing the ordering of Methylprednisolone Acetate from NECC or its affiliated companies.
7. Any and all documentation, correspondence, emails, electronically stored documents, letters, memorandum or other documents relating to or referencing the ordering of Methylprednisolone Acetate from any compounding pharmacy.
8. Any and all documents, correspondence, emails, electronically stored documents, letters memorandum, pictures, drawings, notes or other items produced to the PSC, whether formally or informally.
9. Any and all documents, correspondence, emails, electronically stored documents, letters memorandum, pictures, drawings, notes or other items produced to the department of justice, FBI, FDA or other investigative authority, whether formally or informally.
10. Any and all practices or policies (written or oral) and the implementation of, decision to implement or actual implementation of policies for treating patients with fungal meningitis or exposure to contaminated MPA in 2012 to present.
11. Any and all policies (written or oral) addressing the administration of Epidural Steroids.

12. Any and all policies (written or oral) addressing the use of, ordering of, storage or, procurement of, or relating in any way to compounded mediation.
13. Any and all efforts, investigation, findings, reports, memoranda, letters, conclusions, impressions, documents, correspondence, site visits, inspections, meetings with NECC or other items related in any way to any investigation performed by Inspira into NECC and its operation.
14. Any and all contacts and/or communication either written or oral or electronically or otherwise between Inspira and Premier Orthopedic Associates.
15. Any and all contacts and/or communication either written or oral or electronically or otherwise between Inspira and NECC and any affiliated party of same.

Dated: May 15, 2015

Respectfully submitted,

Blumberg & Wolk, LLC

Attorneys for: Premier
Orthopaedic and Sports Medicine
Associates of Southern New
Jersey, LLC, trading as Premier
Orthopaedic Associates, Premier
Orthopaedic Associates Surgical
Center, LLC, and Kimberley
Yvette Smith, M.D., a/k/a
Kimberley Yvette Smith-Martin,
M.D., et al

/s/Christopher M. Wolk, Esq.

Christopher M. Wolk, Esq.
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CERTIFICATE OF SERVICE

The undersigned hereby certified that on May 15, 2015, a true and exact copy of the foregoing was filed with this the Clerk of the Court using the ECF system that sent a notification of this filing to all ECF registered counsel of record via email generated by the Court's ECF system.

Respectfully submitted,

Blumberg & Wolk, LLC

Attorneys for: Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, and Kimberley Yvette Smith, M.D., a/k/a Kimberley Yvette Smith-Martin, M.D., et al

/s/Christopher M. Wolk, Esq

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